

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NATHAN JOVEE,

Plaintiff,

v.

MEERA SHIN as a County of Snohomish  
contracted Guardian Ad Litem, COUNTY  
OF SNOHOMISH as a sub-division of the  
State of Washington, COUNTY OF  
SNOHOMISH SHERIFF, DEPUTY  
SHERIFF JIM SIMONESCHI as a County  
of Snohomish Deputy Sheriff, L.M.E., INC.,  
as a Legal Service Provider for the County  
of Snohomish and DOES 1-50,

Defendants.

No.

NOTICE OF REMOVAL

(SKAGIT COUNTY SUPERIOR  
COURT, CAUSE NO. 22-2-00076-29)

Pursuant to 28 U.S.C. § 1443, and 28 U.S.C. § 1446, Defendant Deputy Sheriff Jim Simoneschi hereby removes the above-entitled action to the United States District Court for the Western District of Washington at Seattle. Defendant states:

1. The above-entitled action was filed in the Superior Court of SKAGIT County, Cause No. 22-2-00076-29. A true and correct copy of the Complaint is attached as Exhibit A.

2. Jurisdiction of this Court is based on 28 U.S.C. § 1331, 28 U.S.C. § 1343, 28 U.S.C. §1367, 28 U.S.C. §1441, and/or 28 U.S.C. §1443.

3. Plaintiff's various claims seek damages for violation of the Americans with Disabilities Act, 42 U.S.C. §12101 as well as state law claims.

5. Defendant reserves any and all affirmative defenses, including but not limited to insufficient service of process.

6. Counsel for all served Defendants have consented to removal of this action to federal court.

DATED: February 14, 2022

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KEATING, BUCKLIN & McCORMACK, INC., P.S.

By: /s/ Shannon M. Ragonesi

Shannon M. Ragonesi, WSBA #31951

Attorney for Defendant Deputy Sheriff Jim  
Simoneschi

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 14, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

**Attorneys for Defendant Snohomish County and Snohomish County Sheriff**

Deborah A. Severson

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DATED: February 14, 2022

/s/ Shannon M. Ragonesi

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